

BROEGE, NEUMANN, FISCHER & SHAVER, LLC
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Attorneys for Debtor/Debtor in Possession
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UNITED STATES BANKRUPTCY COURT
District of New Jersey

IN RE :

BRUCE WALLER : CHAPTER 11

Debtor : CASE NO. **09-36368**

: **HEARING DATE: 12/7/2009**
: **HON. MICHAEL B. KAPLAN**
: _____:

CERTIFICATION IN OPPOSITION TO
LANDLORD'S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY

I, Bruce Waller, certifies as follows:

1. I am the Debtor/Debtor-in-Possession in the above-captioned matter.
2. I make this Certification in opposition to the motion for relief from the Automatic Stay filed on behalf of Michael Vasilakis.
3. One of my assets is a lease for premises located at Route 37 and Washington Street, Toms River, Ocean County New Jersey from which an entity known as New Image Auto Car Wash LLC operates its business.
4. I have had the business operated by New Image Auto Car Wash, LLC listed for

sale.

5. On Sunday, November 29, 2009, I met with a gentleman named Ted Forie, who expressed his desire to acquire the car wash entity and the lease for the premises. Mr. Forie advised that he would speak with the Landlord about paying the rent and negotiate with the secured lienholder. The sale of the entity and the acquiring of the lease would enable me to file a viable plan of reorganization.

6. Based upon the foregoing, the motion for relief from the Automatic Stay filed on behalf of Michael Vasilakis should be denied.

I hereby certify that the foregoing is true and correct. I am aware that if any of the foregoing statements are wilfully false, I am subject to punishment.

/s/Bruce Waller
Bruce Waller

Dated: November 30, 2009